

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE: TRIBUNE COMPANY FRAUDULENT
CONVEYANCE LITIGATION

Consolidated Multidistrict Action
11 MD 2296 (WHP)
12 MC 2296 (WHP)

ECF Case

THIS DOCUMENT RELATES TO:

MATTERS LISTED ON EXHIBIT A

**NOTICE OF DEFENDANTS' JOINT PHASE ONE MOTION TO DISMISS
THE INDIVIDUAL CREDITOR ACTIONS WITH PREJUDICE
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(b)(6).**

PLEASE TAKE NOTICE that, pursuant to the Court's Master Case Order No. 3 (the "Master Case Order"), dated September 7, 2012, and Federal Rule of Civil Procedure 12(b)(6), and upon the accompanying memorandum of law and all prior pleadings and proceedings herein, the Defendants in the Individual Creditor Actions, as defined in the Master Case Order, will move before the Honorable William H. Pauley, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on March 1, 2013 at 11:00 a.m., for an order dismissing with prejudice the claims asserted against them.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Master Case Order, answering papers, if any, must be filed on or before December 21, 2012, and Defendants' reply papers, if any, must be filed on or before February 4, 2013.

Dated: New York, New York
November 6, 2012

RESPECTFULLY SUBMITTED,

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